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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

VERNON UNSWORTH,

Plaintiff

v.

ELON MUSK,

Defendant.

Case No. 2:18-cv-08048-SVW (JCx)

Judge: Hon. Stephen V. Wilson

Magistrate Judge: Jacqueline Chooljian

**[PROPOSED] ORDER GRANTING  
SECOND MOTION TO COMPEL**

**[PROPOSED] ORDER GRANTING SECOND MOTION TO COMPEL**

This matter is before the Court on Plaintiff's Second Joint Stipulation on Plaintiff's Motion to Compel Defendant Elon Musk to produce text messages pursuant to Fed. R. Civ. P. 37 and Local Rule 37 ("Joint Stipulation"). (Dkt. 86).

The Court, having considered the parties' Joint Stipulation, the briefs filed by the parties relating thereto, the declarations and exhibits in support thereof, and good cause appearing, hereby **GRANTS** Plaintiff Vernon Unsworth's Motion as follows:

1. Defendant Elon Musk must search whichever cellphone or cellphones he was using during the period from July 2018 through September 2018 (the "Period"), and any backups thereof (including on iCloud), in order to uncover text messages that are responsive to Plaintiff Vernon Unsworth's requests for production of documents numbered 1, 7, 23, 24, 63, and 64. Said search shall be executed both by (a) conducting a text-by-text, eyes-on review of each text message sent during the Period; and (b) performing a keyword search using the terms in the table below.

1. Unsworth! <sup>1</sup>	2. Howard!	3. Higgins!	4. Pattaya
5. Investig!	6. Thai!	7. Pod	8. Tube
9. Sub!	10. Rescue	11. Cave!	12. Dive!
13. Chiang	14. Rai	15. BuzzFeed	16. Mac
17. Stanton	18. Tham	19. Luang	20. Rowena
21. Consul	22. Prime	23. Minister	24. Bangkok
25. Off w/3 record	26. Coach	27. Soccer	28. Apolog!
29. Tweet	30. Twitter	31. Brickhouse	32. Lin w/3 Wood

2. On or before November 19, 2019, Defendant Elon Musk shall produce to Plaintiff Vernon Unsworth the responsive documents revealed by the search described above.

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<sup>1</sup> The symbol "!" denotes a root expander.

